

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

LEILA GREEN LITTLE, JEANNE	§	Civil Action No. 1:22-cv-00424-RP
PURYEAR, KATHY KENNEDY,	§	
REBECCA JONES, RICHARD DAY,	§	
CYNTHIA WARING, AND DIANE	§	
MOSTER,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	
	§	
LLANO COUNTY, RON CUNNINGHAM,	§	
in his official capacity as Llano County	§	
Judge, JERRY DON MOSS, in his official	§	
capacity as Llano County Commissioner,	§	
PETER JONES, in his official capacity as	§	
Llano County Commissioner, MIKE	§	
SANDOVAL, in his official capacity as	§	
Llano County Commissioner, LINDA	§	
RASCHKE, in her official capacity as Llano	§	
County Commissioner, AMBER MILUM,	§	
in her official capacity as Llano County	§	
Library System Director, BONNIE	§	
WALLACE, in her official capacity as	§	
Llano County Library Board Member,	§	
ROCHELLE WELLS, in her official	§	
capacity as Llano County Library Board	§	
Member, RHONDA SCHNEIDER, in her	§	
official capacity as Llano County Library	§	
Board Member, and GAY BASKIN, in her	§	
official capacity as Llano County Library	§	
Board Member,	§	
	§	
Defendants.	§	

**DECLARATION OF LEILA GREEN LITTLE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Leila Green Little, declare:

1. I make this declaration based on personal knowledge. If called upon to testify, I could and would testify competently to the following facts.

2. I am a resident of Llano County. I have a library card that gives me access to books available in the County Library System's public library collection. I have used my County library card to check out books for several years. I read and listen to many different types of books on a variety of topics, including fiction and nonfiction books, and books written for children and adults.

3. I know that several books were removed from Llano County's physical library collection, including the following: (1) *Caste: The Origins of Our Discontent* by Isabel Wilkerson; (2) *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti; (3) *Spinning* by Tillie Walden; (4) *In the Night Kitchen* by Maurice Sendak; (5) *It's Perfectly Normal: Changing Bodies, Growing Up, Sex and Sexual Health* by Robie Harris; (6) a read-aloud picture book series including *My Butt is So Noisy!*, *I Broke My Butt!*, and *I Need a New Butt!* by Dawn McMillan; (7) a read-aloud picture book series including *Larry the Farting Leprechaun*, *Gary the Goose and His Gas on the Loose*, *Freddie the Farting Snowman*, and *Harvey the Heart Has Too Many Farts* by Jane Bexley; (8) *Being Jazz: My Life as a (Transgender) Teen* by Jazz Jennings; (9) *Shine* by Lauren Myracle; (10) *Gabi, a Girl in Pieces* by Isabel Quintero; and (11) *Freakboy* by Kristin Elizabeth Clark. I cannot check out these books because they are no longer on library shelves or in the Llano County library catalog. I would check out these books in the future if they were returned to library shelves.

4. Before the events giving rise to this lawsuit, the Library System also provided library cardholders with a digital catalog called "OverDrive," which gave library patrons access

to a curated collection of over 17,000 digital ebooks and audiobook titles. I have attempted to access OverDrive with my County library card without success.

5. The Library System has three physical locations: the Llano Library Branch (the main branch), the Kingsland Library Branch, and the Lakeshore Library Branch.

6. Ron Cunningham is the Llano County Judge, the head of the County Commissioners Court. Jerry Don Moss, Peter Jones, Mike Sandoval, and Linda Raschke are Llano County Commissioners. Amber Milum is the Library System Director. Bonnie Wallace, Rochelle Wells, Gay Baskin, and Rhonda Schneider were appointed by the Commissioners Court to sit on the County's Library Board (the "New Library Board") in January 2022. Thereafter, the New Library Board elected Gay Baskin as its Chairperson, Bonnie Wallace as its Vice Chair, and Rochelle Wells as its Secretary.

7. Around mid-2021, I learned from County librarians that a community group including Rhonda Schneider was pushing for the removal of certain children's library books that they deemed "inappropriate." I later learned that Rochelle Wells and Bonnie Wallace were also part of this group.

8. In December 2021, I attended a Commissioners Court meeting during which the Commissioners Court voted to dissolve the existing library board and remove its current members and create an entirely new library board with new members appointed by the Commissioners. The Commissioners Court also added the word "advisory" to the board's name, referring to it as the "Library *Advisory* Board" instead.

9. I later learned from County librarians that some of the Library Board's new appointees did not even have library cards before their appointments.

10. Since the creation of the new Library Board, I have attended Commissioners Court meetings for which the Library System was publicly listed as an agenda item to be discussed. At no point during any of these Commissioners Court meetings was it discussed that librarians would need approval from the Library Board before they could purchase any new books. I learned about this new requirement imposed by the Library Board from County librarians who are subject to it and unable to purchase new books. County librarians have also informed me that no new library books have been purchased since October 2021.

11. I searched Llano County's catalog and identified several books currently in the collection that have graphic sexual content, including books such as *A Game of Thrones*, *Canterbury Tales*, *Lady Chatterley's Lover*, and books in the *Outlander* series.

12. In my family, the public library is sacrosanct. My children and I have spent hours and hours and hours in our public libraries. The County's public libraries have been foundational in shaping how my family spends time together and the values that we hold true. As a result, the removal of books from library shelves and the termination of OverDrive has had a profound, indescribable, and deeply personal impact on me and my family. During the seemingly endless nights breastfeeding my then-infant daughter, I would read books on Overdrive to keep the insomnia at bay. I learned how to make a failed attempt at crusty bread while reading a cookbook on OverDrive, which turned out to be a dense loaf more suited for the deer on the other side of my fence. I used OverDrive audiobooks to help lull my son to sleep. Not only do I now lack access to these resources, but I also have had to witness my most treasured and sacred community institution suffer a collapse of the very ideals that make public libraries so special. I walk through the library's aisles afraid that even more books have been silently removed since my last visit. I worry that I will never know whether or when a book has been removed at all.

And with the Library Board requiring pre-approval for all new book purchases and shuttering its doors to the public, I fear that the worst has yet to come. I fear that the government officials in my hometown will use their power to ensure that books they disagree with will never make it to my public library in the first place.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 7, 2022

By:

DocuSigned by:
Leila Green Little
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Leila Green Little